D002

Phone:

(212) 885-5284

Fax:

(917) 332-3834

Email:

JGreenbaum@BlankRome.com

, 1 : 2008

January 10, 2008

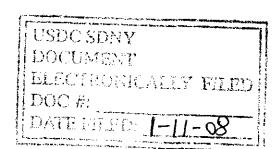
BY <u>FAX</u> (212) 805-0220

Hon. John F. Keenan United States District Judge United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 1930 New York, New York 10007-1312

Re:

Padre Shipping, Inc. v. Yong He Shipping, et al., 07 CV 9682 (JFK)

Our Ref. No. 128047-06501



EMO EMBORSED

Dear Judge Keenan:

We are the attorneys for defendant Tianjin Portrans International Shipping Agency. Further to my conversation today with your Clerk, Mr. Roberts, we are filing today a Supplemental Memorandum and a Second Declaration by Mr. Xu in support of our client's motion to vacate the attachment against it and against funds belonging to our client's customers.

We could not file our papers sooner because it took time to obtain and translate the several relevant Chinese regulations on foreign exchange bank accounts.

I have spoken with Plaintiff's attorney, Mr. Duffy, who understandably will need more time to consider our motion. Therefore, we jointly request that the argument on January 14 be adjourned.

I have also spoken with an attorney, Keith Heard, of Burke & Parsons, who may be retained to intervene on behalf of Golden Pacific Sea (HK) Group Ltd., the party who owns the approximately \$500,000 that has been restrained. He will also need time to prepare a motion if he is formally engaged.

> The Chrysler Building 405 Lexington Avenue New York, NY 10174-0208 www.BlankRome.com

Hon, John F. Keenan January 10, 2008 Page 2

Mr. Duffy and Mr. Heard advise they are generally available during the balance of January. I am available as well, except for January 23 and 31.

Thank you for your attention.

Respectfully submitted,

Jack A. Greenbaum

JAG:aea

By e-mail: cc:

Owen F. Duffy, Esq. (ofd@codus-law.com)

Keith W. Heard, Esq. (heard@burkeparsons.com)

Oral argument is adjourned to January 30, 2008, at 10:00 a.m.

SO ORDERED.

Dated:

New York, New York

January //, 2008

John J. Heer, W., L.

U.S.D.J.

Fax:

Email:

Atty No.: 05026

FAX NO.:

Client/Matter #:

CONFIRMATION NO.:

128947/06501



200 Jan 10 PA 4 25

TQ:

(917) 332-3834

JGreenbaum@BlankRome.com

FAX TRANSMITTAL FORM

Date: January 10, 2008

FIRM:

	ble John F. Keenan States District Judge	USDC, SDNY	212-80 (212) 80)5-0220 >	
From:	Jack A. Greenba	11m			
1 1 9 1111 -	Jack 11. Olconon	um			
				# of Pages:	3

ORIGINAL:		WHEN COMPLETED:		
Will Follow:		Call For Pickup:	Х	
Will Not Follow:	Y	Send Interoffice:		

			
COVER MESSAGE:	•		
DI DA ON AND A COMPA CITIED			
PLEASE SEE ATTACHED.			
,			
		•	
CONFIDENTIAL PROPERTY		_	
CONFIDENTIALITY NOTE:	raina anntain infoti	tick assume as fidential and as levelly	Standard from the law E EDIII-
The documents accompanying this fax transm.			
Rome LLP. The information is intended only recipient, you are hereby notified that any discl			
is strictly prohibited, and that the documents sh			
immediately at the number listed above, coll			
unauthorized disclosure, use, or publication of			
liability.	Contidential or privileges in	iometion madventently transmitted to y	Of may result in chimital and/or civil
nacinity.	<u> </u>	 ,	
TRANSMITTED BY:	DATE SENT:	TIME SENT:	TIME CALLED:
IIVANGMITTED BT,	DATE BENT:	THE SENT.	HAIE GALLED:
PHOV:	NO ANEMETI-	M/BONG MURDER	NO CONNECTION
BUSY:	NO ANSWER:	WRONG NUMBER:	NO CONNECTION:

405 Lexington Avenue, New York, NY 10174-0208 212.885.5000 Fax: 212.885.5001

www.BlankRome.com